

RAYMOND & RAYMOND

Attorneys at Law

Herbert B. Raymond, Esq.
Jeffrey M. Raymond, Esq.
Kevin de Lyon, Esq.

7 Glenwood Avenue, 4th Fl., Ste. 408
East Orange, NJ 07017
Telephone (973) 675-5622
Facsimile (408) 519-6711
Voice-Mail/Alt. Fax (815) 642-4613
Email: bankruptcy123@comcast.net
Website: www.bankruptcylaw123.com

March 27, 2019

Honorable John Sherwood, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut St., 3rd Floor
Newark, NJ 07102

Re: Kim Worthington, Debtor(s)
18-28670
Chapter 13
Proceeding: Trustee Default Certification
Hearing Date: To Be Determined

Dear Judge Sherwood:

Please accept this letter in opposition to the above matter. We have been unable to prepare a formal response to this certification with the debtor. However, debtor has since made a payment of \$300 on 3/25 and indicates that another money order was sent which would cure the arrears, though has yet to post. Since the deadline to respond is today, I would request that the court schedule a hearing on the matter.

Respectfully submitted,

/S/ HERBERT B. RAYMOND, ESQ.

HERBERT B. RAYMOND, ESQ.